

**IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**DOLORES (DEE) BARRETT**

**V.**

## CIVIL ACTION - LAW

**THE GREATER HATBORO CHAMBER  
OF COMMERCE, INC.; JOHN J.  
(BUD) AIKEN, AND MICKEY GLANTZ**

**NO. 02-cv-4421**

**AFFIDAVIT**

**COUNTY OF MONTGOMERY** :  
: SS.  
**STATE OF PENNSYLVANIA** :

I, Joseph J. Tryon, Jr., being duly sworn according to law, depose and say that I am the President of the Greater Hatboro Chamber of Commerce and that I am familiar with Plaintiff's Request for Production of Documents served on the Chamber and I personally was involved with searching the Chamber's office for the documents requested in said document

I further aver that the documents that were in our possession at the office, except for Minutes of the Meetings, have been produced. The Minutes of the Meetings have been located within the office and sent out for copying and are now being produced.

I further aver that we have requested the other documents from people outside of our office including copies of the original insurance policies from our insurance agent, the corporate tax returns and annual finance reports from our previous and current financial officers, and complete records from Diversified Technical Lines in regards to insurance commissions paid to the Chamber. The Plaintiff, Dolores (Dee) Barrett was responsible for keeping all records prior to her departure and unfortunately, the record keeping was not properly preformed and the Chamber has to request other parties to produce the documents.





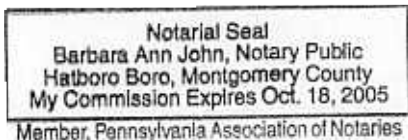
In particular, the Plaintiff did not keep the quarterly commission statements or other records provided by Diversified Technical Lines and therefore requests have been made by the Chamber directly to this company for their records.

I further aver that the employment file and information pertaining to the Plaintiff's employment was removed from the Chamber's office at the time that the Plaintiff left the office.

I have personally requested all parties that may have the information subject to Plaintiff's request to produce what they have forthwith and I will make it available as soon as it is received.

Sworn to and subscribed before  
me this 17<sup>th</sup> day of  
May A.D. 2004

Barbara Ann John  
Notary Public



Joseph J. Tryon, Jr.  
Joseph J. Tryon, Jr.  
President,  
Greater Hatboro Chamber  
Of Commerce